

EXHIBIT 4

DISTRICT COURT OF THE U.S. VIRGIN ISLANDS
DIVISION OF ST. THOMAS & ST. JOHN

John St. Rose, Monroe Loctar, and
Derrick James, individually and on
behalf of all others similarly situated,

Plaintiffs

v.

Spartan Concrete Products, LLC, and
Warren Mosler

Defendants.

Case No. 3:19-cv-00117

Jury Trial Demanded

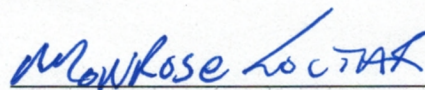
Putative Class Action

DECLARATION OF MONROSE LOCTAR

I, Monroe Loctar, pursuant to 28 U.S.C. § 1746, declare as follows:

1. I make this declaration in support of Plaintiff's Opposition to Spartan Concrete Products, LLC and Warren Mosler's Motion for Summary Judgment.
2. I was not aware of the agreement between Spartan and Heavy Materials to divide the market for ready-mix by island prior to the summer of 2019.
3. When I purchased ready-mix concrete from Spartan on July 7, 2015, I was under the mistaken belief that Spartan had acquired Heavy Materials. I had no reason to believe that their arrangement was unlawful.
4. I am familiar with the Requirement Supply Agreement. I misunderstood Defendants' one question about it at my deposition.

Executed on July 9th, 2021.


Monroe Loctar